

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MASSACHUSETTS

SUZANNE GENEREUX and BARRY
GENEREUX, Individually and as Parents and
Natural Guardians of their minor children,
ANGELA GENEREUX and KRISTA
GENEREUX,

Plaintiffs

v.

AMERICAN BERYLLIA CORP., BRUSH
WELLMAN, INC., BRUSH WELLMAN
CERAMICS INC., BRUSH WELLMAN
CERAMIC PRODUCTS INC., HARDRIC
LABORATORIES, INC., KYOCERA
AMERICA, INC., KYOCERA INDUSTRIAL
CERAMICS CORP., and RAYTHEON
COMPANY,

Defendants

CIVIL ACTION
NO: 04-12137-JLT

**PLAINTIFFS' MOTION FOR ADMISSION OF CO-COUNSEL
PRO HAC VICE AND PLAINTIFFS' L.R. 7.1 CERTIFICATE**

Plaintiffs hereby move that attorneys Ruben Honik, Sherrie J. Cohen, Stephan Matanovic of the law firm Golomb & Honik, 121 Broad Street - 9th Floor, Philadelphia, Pennsylvania 19107 (215-985-9177), each be admitted *pro hac vice* in this lawsuit as co-counsel to the undersigned. As grounds for this motion, plaintiff states that, like the undersigned, the law firm of Golomb & Honik is counsel to the plaintiff and has served as plaintiff's counsel in other cases involving beryllium poisoning cases. In support of this motion, the plaintiff attaches **Exhibits A - C**, Certificates Pursuant to L.R. 83.5.3.

L.R. 7.1 CERTIFICATION

I, Bradley M. Henry, counsel for the plaintiffs, hereby certify that, on Friday, December 10, 2004, and on Monday, December 13, 2004, I sought assent to this motion from various attorneys

representing the defendants and that, on Wednesday, December 15, 2004, I sent an e-mail specifically requesting such assent from all defendants. While any type of response from some defendants has yet to have been received, other attorneys for the defense informed me that they still had to obtain clearance from their principals and/or were still considering whether to assent although all stated that they expected assent would be forthcoming. Counsel for the defendant American Beryllia Corp. promptly sought, and granted, assent. Consequently, rather than further delay the filing of this motion which no party appears to oppose and which the plaintiffs' cannot fathom raises any issues to be narrowed, plaintiffs hereby submit this motion for consideration.

The Plaintiffs,
By their Attorneys,

/s/ Bradley M. Henry

Leo V. Boyle, BBO No. 052700
 Bradley M. Henry, BBO No. 559501
 MEEHAN, BOYLE, BLACK & FITZGERALD, P.C.
 Two Center Plaza, Suite 600
 Boston, Massachusetts 02108
 (617) 523-8300

CERTIFICATE OF SERVICE

I, Bradley M. Henry, certify that on December 17, 2004, I served the foregoing Plaintiffs' Motion for Admission *Pro Hac Vice*, by electronic filing and by mailing an exact copy thereof, postage prepaid to all counsel of record: John C. Wyman, Esq., MURTHA CULLINA, LLP, 99 High Street - 20th Floor, Boston, MA 02110-2320; James F. Kavanaugh, Jr., Esq. and Ronald M. Jacobs, Esq., CONN, KAVANAUGH, ROSENTHAL, PEISCH & FORD, LLP, Ten Post Office Sq., Boston, MA 02109; Alan M. Spiro, Esq., EDWARDS & ANGELL, LLP, 101 Federal St., Boston, MA 02110; Robert M.A. Nadeau, Esq., NADEAU & ASSOCIATES, P.A., Route 1, Unit 4A, Wells, Maine 04090; William F. Ahern Jr., Esq., CLARK, HUNT & EMBRY, 55 Cambridge Parkway, Cambridge, MA 02142.

/s/ Bradley M. Henry

Bradley M. Henry

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**CERTIFICATION OF RUBEN HONIK IN SUPPORT OF THE
PLAINTIFFS' MOTION FOR ADMISSION *PRO HAC VICE***

I, Ruben Honik, do hereby state and depose on my oath and on personal knowledge as follows:

1. I am an attorney the law firm Golomb & Honik, P.C., 121 Broad Street - 9th Floor, Philadelphia, Pennsylvania 19107 and I am duly admitted to practice law in the following courts: the Supreme Court of the Commonwealth of Pennsylvania; the Supreme Court of the State of New Jersey; the United States District Court for the Eastern District of Pennsylvania; the United States District Court for the District of New Jersey; the United States Court of Appeals for the Third Circuit; and the United States Supreme Court. Since my admission to the bar, I have been and remain a member in good standing of all jurisdictions in which I have been admitted and there are no disciplinary proceedings pending against me in any of those jurisdictions.

2. This certification is submitted in support of a motion for admission *pro hac vice* for the purpose of assisting in the legal representation of the plaintiffs. As counsel for the plaintiffs, in order to remain fully apprised of all the events of this case and to assist and participate in its prosecution, it is necessary for me to seek admission *pro hac vice*.

3. I am generally familiar with the Local Rule for the United States District Court for the District of Massachusetts and, in addition, fully expect to work with Boston co-counsel in this matter.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 17th DAY OF DECEMBER, 2004.

/s/ Ruben Honik

Ruben Honik

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**CERTIFICATION OF SHERRIE J. COHEN IN SUPPORT OF THE
PLAINTIFFS' MOTION FOR ADMISSION PRO HAC VICE**

I, Sherrie J. Cohen, do hereby state and depose on my oath and on personal knowledge as follows:

1. I am an attorney the law firm Golomb & Honik, P.C., 121 Broad Street - 9th Floor, Philadelphia, Pennsylvania 19107 and I am duly admitted to practice law in the following courts: the Supreme Court of the Commonwealth of Pennsylvania; the Supreme Court of the State of Florida; the United States District Court for the Southern District of Florida; and the United States Supreme Court. Since my admission to the bar, I have been and remain a member in good standing of all jurisdictions in which I have been admitted and there are no disciplinary proceedings pending against me in any of those jurisdictions.

2. This certification is submitted in support of a motion for admission *pro hac vice* for the purpose of assisting in the legal representation of the plaintiffs. As counsel for the plaintiffs, in order to remain fully apprised of all the events of this case and to assist and participate in its prosecution, it is necessary for me to seek admission *pro hac vice*.

3. I am generally familiar with the Local Rule for the United States District Court for the District of Massachusetts and, in addition, fully expect to work with Boston co-counsel in this matter.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 17th DAY OF DECEMBER, 2004.

/s/ *Sherrie J. Cohen*

Sherrie J. Cohen

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**CERTIFICATION OF STEPHAN MATANOVIC IN SUPPORT OF THE
PLAINTIFFS' MOTION FOR ADMISSION *PRO HAC VICE***

I, Stephan Matanovic, do hereby state and depose on my oath and on personal knowledge as follows:

1. I am an attorney the law firm Golomb & Honik, P.C., 121 Broad Street - 9th Floor, Philadelphia, Pennsylvania 19107 and I am duly admitted to practice law in the following courts: the Supreme Court of the Commonwealth of Pennsylvania; the United States District Court for the Eastern District of Pennsylvania; and the United States Court of Appeals for the Third Circuit. Since my admission to the bar, I have been and remain a member in good standing of all jurisdictions in which I have been admitted and there are no disciplinary proceedings pending against me in any of those jurisdictions.

2. This certification is submitted in support of a motion for admission *pro hac vice* for the purpose of assisting in the legal representation of the plaintiffs. As counsel for the plaintiffs, in order to remain fully apprised of all the events of this case and to assist and participate in its prosecution, it is necessary for me to seek admission *pro hac vice*.

3. I am generally familiar with the Local Rule for the United States District Court for the District of Massachusetts and, in addition, fully expect to work with Boston co-counsel in this matter.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 17th DAY OF DECEMBER, 2004.

/s/ Stephan Matanovic

Stephan Matanovic